

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

IN RE KRAFT HEINZ
SECURITIES LITIGATION

Case No. 1:19-cv-01339

Judge Robert M. Dow Jr.

Magistrate Judge Maria Valdez

**THE KRAFT HEINZ DEFENDANTS' MOTION TO COMPEL
DISCOVERY FROM UNION ASSET MANAGEMENT HOLDING AG**

Pursuant to Rule 37 of the Federal Rules of Civil Procedure and Northern District of Illinois Local Rule 37.2, the Kraft Heinz Company (“Kraft Heinz”), Paulo Basilio, Alexandre Behring, Bernardo Hees, David Knopf, Rafael Oliveira, and George Zoghbi (collectively, the “Kraft Heinz Defendants”) file this motion to compel Lead Plaintiff Union Asset Management Holding AG (“Union”) to produce documents and information regarding all Union funds that bought or sold Kraft Heinz common stock or options during the Class Period. As set forth in greater detail in the memorandum of law in support of this motion, Union has failed to produce documents and information about its analysis of and trading in Kraft Heinz common stock or options by certain of its funds and portfolio managers despite Kraft Heinz Defendants requesting that information in their interrogatories and requests for documents. Union’s written discovery responses did not clearly articulate that certain of its funds and portfolio managers were being shielded from discovery, and that limitation was not revealed until Union’s Rule 30(b)(6) deposition on the eve of the conclusion of class certification discovery. Union’s failure to provide this discovery is improper, and it should be compelled to provide the requested documents and information concerning all of its funds that bought or sold Kraft Heinz common stock or options during the Class Period.

WHEREFORE, as set forth more fully in the Kraft Heinz Defendants' memorandum of law in support of this motion, the Kraft Heinz Defendants request: (1) that Union be ordered to produce promptly the discovery responsive to the Kraft Heinz Defendants' Requests for Production Nos. 4–14, 20, and 36–44 and Interrogatory Nos. 2, 3, 5, and 6 for all of its funds that bought or sold Kraft Heinz common stock or options during the Class Period; and (2) that the class certification record be held open until 30 days following completion of production of such documents and information to allow the Kraft Heinz Defendants to take additional testimony and supplement the record as appropriate.

Dated: July 18, 2022

Respectfully submitted,

/s/ William A. Clareman

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